

The Honorable Marc L. Barreca
Hearing date: October 31, 2014
Hearing time: 9:30 a.m.
Response date: October 24, 2014
Chapter 7
Location: Seattle

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re:

DONNA ALLEN,

Debtor.

No. 14-14184

MOTION FOR SALE OF PROPERTY
FREE AND CLEAR OF LIENS

COMES NOW the Trustee, Edmund J. Wood, by and through the undersigned attorney, and moves the Court for an order permitting sale of the real property located at 9022 Dayton Ave N, Seattle, WA, free and clear of all liens, for the sum of \$275,000.00 to Ben Bergstrom, and/or assigns, or to the individual(s) making the highest and best offer to the estate at or before the hearing on this Motion.

The Trustee also seeks authority to pay the first position Deed of Trust of Ameriquest Mortgage Securities Inc., Asset-Backed Pass-Through Certificates, Series 2003-11, and/or assigns, in full in the amount of approximately \$227,848.84, plus *per diem*, in full satisfaction of its lien against this property, and the federal tax liens of the Internal Revenue Service, in the amount of approximately \$17,829.88 after payment to the above secured creditor in full, and after all costs of closing, including real estate commissions, property taxes, excise taxes and other closing costs, together with a buyer's premium to the estate in the amount of \$20,000.

Said sale to Ben Bergstrom, and/or assigns, will be free and clear of all liens and interests, said liens and interests to attach to the proceeds of the sale as though those proceeds

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1 were the property, with the exception of the buyer's premium to the estate in the amount of
2 \$20,000. The Trustee agrees that one half of such amount will be distributed to unsecured
3 creditors. Notwithstanding the foregoing, the Trustee requests the authority to pay the above
4 named secured creditors in the approximate amounts stated.
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6 DATED this 3rd day of October, 2014.

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8 /s/ Kathryn A. Ellis

Kathryn A. Ellis, WSBA #14333

Attorney for Trustee

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